

# **Exhibit C**

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March 30, 2005

**FACSIMILE AND FIRST CLASS MAIL**

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Re *ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al.*  
 Civil Action No. 04-10353 PBS  
 Our File 2639/509

Dear Paul:

Pursuant to the Court's Order of March 16, 2005, the parties were instructed to identify claim terms in dispute prior to briefing issues of claim construction. This initial exchange of information was to be completed by today, March 30, 2005.

As you know, ScanSoft has asserted that claims 1-6 of the '966 patent are infringed by Voice Signal's voice recognition products. ScanSoft also intends to assert that claims 16, 20-22, 26, 27 and 29 are also infringed by Voice Signal's products. ScanSoft believes the words used in these claims should be given their ordinary meaning to a person of skill in the art.

ScanSoft is aware that Voice Signal has asserted that claims 1-6 should be interpreted to require that the voice recognition required by the claims must take place at a mobile telecommunication switch. ScanSoft, however, has no knowledge regarding what claim term or terms VST relies upon to support this proposed limitation.

ScanSoft is also aware that Voice Signal has asserted that certain ScanSoft voice recognition products infringe claims 7 and 16 of the '630 patent. The following tables provide correct claim constructions for those claim elements expected to be at issue:

*Claim 7:*

Claim Element	Correct Claim Construction
7. A method of activating an electrical device through at least one audio command from a user, the method comprising the steps of:	

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recording speech recognition data having a command word portion and a pause portion, each of the speech recognition data portions being at least one syllable in length;	<i>Ordinary meaning to one of skill in the art:</i> At least one syllable in length is about 200 milliseconds.
receiving at least one audio command from a user, the at least one audio command having a command word portion and a pause portion, each of the audio command portions being at least one syllable in length;	
comparing said command word portion and said pause portion of said at least one received audio command with said command word portion and said pause portion, respectively, of said speech recognition data;	<i>Ordinary meaning to one of skill in the art:</i> An input command having a word portion of at least one syllable in length (~200 milliseconds) and a pause portion of at least one syllable in length is compared to speech recognition model data having a word portion at least one syllable in length and a pause portion at least one syllable in length.
generating at least one control signal based on said comparison;	<i>Ordinary meaning to one of skill in the art:</i> A control signal is a signal that operates power to an electrical device.
controlling power delivered to an electrical device in response to said at least one control signal for operating the electrical device in response to said at least one received audio command;	<i>Ordinary meaning to one of skill in the art:</i> Power is controlled to an electrical device in response to a control signal generated in response to an input audio command.
analyzing the pause portion of the received audio command for spectral content; and	
preventing operation of the electrical device when the spectral content is dynamic.	<i>Ordinary meaning to one of skill in the art:</i> Operation of the electrical device is prevented when the at least one syllable long pause portion of the input audio command has dynamic spectral content.

*Claim 16:*

16. A method of activating an electrical device through at least one audio command from a user, the method comprising the steps of:	
recording speech recognition data having a command word portion and a pause portion, each of the speech recognition data portions being at least one syllable in length;	<i>Ordinary meaning to one of skill in the art:</i> At least one syllable in length is about 200 milliseconds.
receiving at least one audio command from a user, the at least one audio command having first and second command word portions and a first, second and third pause portions, each of the audio command portions being at least one syllable in length, said second pause portion having one syllable in duration before said first command word portion and said third pause portion having one syllable in duration after said second	

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command word portion;	
comparing said command word portion and said pause portion of said at least one received audio command with said command word portion and said pause portion, respectively, of said speech recognition data;	<i>This claim element is indefinite and fails to satisfy the requirements of 35 U.S.C. §112. Therefore, it cannot be correctly construed.</i>
generating at least one control signal based on said comparison;	<i>Ordinary meaning to one of skill in the art: A control signal is a signal that operates power to an electrical device.</i>
controlling power delivered to an electrical device in response to said at least one control signal for operating the electrical device in response to said at least one received audio command.	<i>Ordinary meaning to one of skill in the art: Power is controlled to an electrical device in response to a control signal generated in response to an input audio command.</i>

Unfortunately, Voice Signal has refused to agree to exchange anything more than a list of claim terms from the '966 and '630 patents that it believes require judicial construction. As stated in ScanSoft's recent Emergency Motion for Clarification of the Court's Order, Voice Signal's refusal to identify the constructions it proposes for those terms makes determining the scope of any claim construction dispute an impossible task. Given the lack of information supplied by Voice Signal, ScanSoft is currently unable to determine whether there is a dispute as to the proper definition of the terms of the patents-in-suit.

I again ask you to review Voice Signal's position and consider a more cooperative path forward so that the parties can move on to briefing claim construction without further delay and complete that briefing on the accelerated schedule set forth by the Court.

Sincerely,



Jack C. Schecter